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ACTION ITEM STATUS

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EGEG ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

August 13, 1993

93-RF-9967

J. K. Hartman Environmental Restoration Division DOE, RFO

INITIATION OF D&D PLANNING FOR BUILDING 788 - NMH-414-93

Ref: J. K. Hartman Itr (08702), to N. M. Hutchins, Same Subject, August 2, 1993

This letter provides the response to the above referenced letter. A copy of the briefing material is attached.

The planned acceleration of the OU-4 closure activities accelerated the need to establish the extent, objectives, and necessity for the Decontamination and Decommissioning (D&D) of Building 788 and other outside equipment to preclude an adverse impact on these activities. Formal documentation of this decision process needs to be established during the planning process. A preliminary evaluation of the need for D&D includes the following:

The current strategy/presumed remedial action for the IAG Phase I remediation efforts for the Solar Evaporation Ponds/Operable Unit 4 is to design and construct one RCRA "equivalent" cover/engineering barrier for all the pond areas. This technology is considered an "off the shelf" technology which is utilized extensively in the environmental industry for closing surface impoundments and landfills.

Building 788, plus ancillary exterior equipment, is currently between Ponds 207A and 207C. Due to the location of this building relative to these two critical surface impoundments, it will be necessary for Building 788 and ancillary equipment to be completely removed from its current location prior to the completion of closure/remediation of the solar ponds. The removal of this structure will allow for an efficient design and construction of a RCRA equivalent cover for the ponds. In addition, the "Original" Solar Pond which, because of boundary uncertainties, may be partially located below Building 788, will require some degree of remediation relative to the IAG Phase I Remediation Program.

Numerous complications and inefficiencies would certainly exist in the event Building 788 was not removed prior to closure/remediation of the Solar Evaporation Ponds. The following complications would be a consideration:

Two design packages would be required for the ponds. One package for 207C and one package for 207A and B-Series. This would result in additional costs.

Two independent RCRA covers located relatively close together could create a mechanism for precipitation to infiltrate between the two closure covers creating leachate which would require treatment.

A major modification of the two covers would be required to "connect" the two covers together to maintain cover integrity should Building 788 be removed after closure/remediation of the ponds. This would result in a significant cost increase.

AL485

Removal of Building 788 subsequent to final closure will be complicated due to the space constraints for working between the two covers. There is also a high probability the RCRA covers would be damaged during demolition of the building.

The following is the specific responses to the actions requested in your correspondence:

1. Evaluate the option for funding Building 788 D&D planning efforts in the remainder of FY93.

The FY93 planning D&D effort will cost approximately \$80,000. The majority of the effort will be completed by personnel already on the program, the remainder of the funding will be needed to cover the cost of a subcontractor, if necessary. The preparation and approval of a baseline change proposal (BCP) to redistribute the budgets and add the D&D planning scope to the appropriate work packages will be required.

The options for funding the FY93 planning are:

- Change the appropriate work packages through the BCP process and fund the extra effort with Management Reserve funds.
- Add a new work package to the ER project and fund the entire effort with Management Reserve.
- 2. Recommend an option for funding FY94 Building 788 D&D activities.

The projected FY94 D&D funding needed for the Building 788 planning is \$2,000,000, which consists of approximately ten FTE's for the entire year. There is no provision in our FY94 budget plan to fund this effort. The options for funding this effort are:

- New funding
- The re-prioritization of existing funding relating to other Environmental Restoration activities. At this time, we are still performing DOE/HQ budget cutting exercises and are not certain what our FY94 Budget Authority (BA) will be. Given this uncertainty, it is difficult to identify the exact source of funds.

The consequence of any re-prioritization would be the possible negative impact on meeting Interagency Agreement (IAG) milestone dates.

3. Identify what near-term actions need to occur to support this effort between now and September 30, 1993.

FY - 93 Tasks

- Determine the extent of the physical structures and equipment that should be Decontaminated and Decommissioned to meet the OU -4 remediation planned initial conditions.
- For those structures and equipment determined to require D & D, obtain and review the applicable drawings for accuracy. Identify those drawings requiring "red-lining" to reflect the as built condition.

- Obtain B-788 operating history to provide a basis for development of a characterization plan.
- Develop a listing of the required supporting documentation including purpose, scope, and what organization would be responsible for development of the document.
- Develop a preliminary Work Breakdown Structure for the FY-94 planning effort and the organizational support required.
- Identify the purpose and scope of deliverable documents required to be prepared in FY-94.
- Develop preliminary Scope, Schedule, and cost for the FY-94 planning effort.
- Prepare FY-94 work package.
- 4. Provide a high-level schedule showing major activities and points of interface between the building and equipment and the OU-4 schedule.

The OU-4 accelerated schedule is still in review and development as is the schedule for the containerization of the pondsludge. A schedule and commitments can be established when the schedules are finalized and a documented decision on the objectives and extent of D&D exists. OU-4 construction start can occur prior to the commencement of D&D, but cannot complete.

5. Identify the roles and responsibilities of EG&G groups required to support this effort.

The following is an initial list of organizations and roles. This will be updated as the objectives and extent of D&D is developed and approved.

<u>Organ</u>	ization	Role		
Environmental Restoration Management				
ERM	D&D Program	Program Management		
ERM	Environmental Science & Engineering	Develop Engineering Scope, Interface with Plant Engineering, Technical oversight		
ERM	Solar Pond Projects	Develop OU-4 D&D requirements		
ERM	Records, Documentation Management and Quality Support	Develop QA plan and Records Management Requirements		

J. K. Hartman August 13, 1993 93-RF-9967 Page 4

ERM Facility Operations

Assume operations management of OU-4 after B788 Safe Shutdown and De-activation; Readiness Review

Environmental and Waste Management

Waste Operations

Operations Management of B-788 prior to B-788 Safe Shutdown and

De-activation

RCRA Regulatory Programs

Prepare unit 21 RCRA closure plan and associated permitting issues

Waste Regulatory Programs

Provide guidance on RCRA waste

Ecology and NEPA

NEPA development and resolution

of issues

Standards, Audits, and Assurance

Site Quality assurance

Quality Assurance and approval of

Waste Disposal Plan

Safety, Safeguards, and Security

Radiation Protection

Radiological Engineering support, Radiological operations support

Industrial Hygiene and Safety

Health and Safety /plan

development and issue resolution

Engineering and Technology

Project Engineering

Provides drawings of B-788 and equipment. Provide drawing update to as built configuration

Maintenance and Plant Support

Traffic

Traffic committee approval of movement of Waste and Construction support

Property Management

Accountability of DOE equipment

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Administration and Planning

Central Planning and Budget

Schedule and Work Package

support

Procurement

Provide support for procurement

activities

Transition Management

Facility Transition Processes

Provide project oversight to ensure

coherence with site programs

Construction Management

Provide on site construction oversight of demolition work

If you have any questions regarding the above, please contact Tye DeMass at extension 8760.

N M Hutchins

Acting Associate General Manager Environmental Restoration

EG&G Rocky Flats, Inc.

DRF:bep

Attachment:

As Stated

Orig. and 1 cc - J. K. Hartman

Attachment I 93-RF-9967 Page 1 of 11

DECONTAMINATION AND DECOMMISSIONING BUILDING 788

AUGUST 16, 1993

EGEB ROCKY FLATS

IN EGEB ROCKY FLATS

PRELIMINARY EVALUATION OF NEED FOR B788 D&D

One RCRA cap versus two RCRA caps

- Increased design and construction
- Infiltration of precipitation between two caps
- Building access would be restricted by RCRA cap concerns
- Extent of original 207C pond is not firmly established

Post closure concerns with two caps

- Eventual D&D activities of B788 will be constrained by space
- Two caps would require joining

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FY93 PLANNING EFFORT

- FY93 Costs are approximately \$80,000
- Baseline Change Proposal is required to begin effort
- Planning will be funded from Management Reserve
- Creation of FY94 Work Package

IN EGEG ROCKY FLATS

FY94 PLANNING EFFORT

- FY94 Costs are approximately \$2,000,000
- Subproject Baseline will be developed
- New funding is needed
- Re-prioritized funding from other ER activties is uncertain

INITIAL B788 D&D FY94

ON EGEG ROCKY FLATS

PLANNING TASK OUTLINE

Develop the following documents

- Management Plan
- Performance Criteria
- Waste Management Plan
- Waste Disposal Options
- Risk Assessment
- Site Specific Health and Safety Plan
- Quality Assurance Plan
- Validation Requirements
- **Document Control Plan**
- NEPA
- Facility/Building Characterization Plan
- **Decontamination Plan**

Attachment I 93-RF-9967 Page 6 of 11

PLANNING TASK OUTLINE INITIAL B788 D&D FY94

(continued)

Prepare the following

- Detailed Scope

- Detailed Schedule

Bottoms Up Cost Estimate

- Procurement Packages

FY95 Work Package

Finalize and submit Unit 21 RCRA Closure Plan to DOE & Regulatory Agencies

REQUIRED FY93 TASKS

- Determine the structures and equipment that need to be D&D'd to facilitate OU-4 remedial action and post closure requirements
- equipment to be D&D'd. Review the drawings and "red-Obtain applicable drawings for the structures and line" them to reflect current field conditions
- radiological and waste surveys to provide a basis for Obtain Building 788 operating history and current developing the Characterization Plan
- activities. Generate purpose, scope, and organizational Identify supporting documentation required for D&D responsibility for development of each document identified

REQUIRED FY93 TASKS

(continued)

- Develop a preliminary Work Breakdown Structure and required organizational support for the FY94 planning effort
- Develop preliminary Scope, Schedule, and Cost Estimate for the FY94 planning effort
- Prepare FY94 Work Package and submit for approval

INITIAL LIST OF ORGANIZATIONAL ROLES AND RESPONSIBILITIES

Environmental Restoration Management

- Program Management
- Develop scope, objectives
- Readiness Reviews
- QA Plan development
- Records Management
- Operations post de-activation

Environmental Waste Management

- Current operations management
- Deactivation plan
- RCRA closure
- Waste guidance
- NEPA

IN EGEG ROCKY FLATS

INITIAL LIST OF ORGANIZATIONAL ROLES AND RESPONSIBILITIES

- Standards, Audits, Assurance
- Quality assurance support
- Concur in waste disposal methods
- Safety, Safeguards, and Security
- Radiological Engineering support
- RPT's
- Industrial Hygiene and Safety
- **Engineering & Technology**
- Engineering Support for drawings
- Maintenance and Plant Support
- Traffic committee review
- Property Management

INITIAL LIST OF ORGANIZATIONAL ROLES AND RESPONSIBILITIES

(continued)

- Administration and Planning
- Central Planning and Budget support
- Procurement
- Transition Management
- Review project for coherence with plant D&D objectives
- Provide Construction Management